

# EXHIBIT J

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EPIC GAMES, INC.,  
Plaintiff,  
Counter-defendant,

vs.

Case No. 4:20-cv-05640  
YGR

APPLE INC.,  
  
Defendant,  
Counterclaimant.

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IN RE APPLE IPHONE  
ANTITRUST LITIGATION

Case No. 4:11-cv-06714  
YGR

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(caption cont'd)

1 DONALD R. CAMERON, et al.,

2 Plaintiffs,

3 vs.

Case No. 4:19-cv-03074

YGR

4 APPLE INC.,

5 Defendant.

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10 \*\*HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY\*\*

11 ZOOM DEPOSITION OF MICHAEL I. CRAGG, Ph.D.

12 (Reported Remotely via Video & Web Videoconference)

13 Belmont, Massachusetts (Deponent's location)

14 Monday, March 29, 2021

15 Volume I

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20 STENOGRAPHICALLY REPORTED BY:

21 REBECCA L. ROMANO, RPR, CSR, CCR

California CSR No. 12546

22 Nevada CCR No. 827

Oregon CSR No. 20-0466

23 Washington CCR No. 3491

24 JOB NO. 4511403

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10 ZOOM DEPOSITION OF MICHAEL I. CRAGG,  
11 Ph.D., taken on behalf of the  
12 Defendant/Counterclaimant, with the deponent  
13 located in Belmont, Massachusetts, commencing at  
14 9:14 a.m., Monday, March 29, 2021,  
15 remotely reported via video & web videoconference  
16 before REBECCA L. ROMANO, a Registered Professional  
17 Reporter, Certified Shorthand Reporter, Certified  
18 Court Reporter.  
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APPEARANCES OF COUNSEL

(All parties appearing via web videoconference)

For the Plaintiff/Counter-Defendant - Epic Games,  
Inc.:

CRAVATH, SWAINE & MOORE LLP

BY: PETER T. BARBUR

BY: G. ALEJANDRO CARVAJAL

BY: HECTOR J. VALDES

Attorneys at Law

825 Eighth Avenue

New York, New York 10019

(212) 474-1000

pbarbur@cravath.com

acarvajal@cravath.com

hvaldes@cravath.com

/////

APPEARANCES OF COUNSEL(cont'd)

(All parties appearing via web videoconference)

For the Defendant/Counterclaimant - Apple Inc.:

GIBSON, DUNN & CRUTCHER LLP

BY: DANIEL G. SWANSON

Attorney at Law

333 South Grand Avenue

Los Angeles, California 90071-3197

(213) 229-7430

dswanson@gibsondunn.com

and

BY: JULIAN WOLFE KLEINBRODT

BY: WARREN LEOGERING

Attorneys at Law

555 Mission Street

Suite 3000

San Francisco, California 94105-0921

jkleinbrodt@gibsondunn.com

wloegering@gibsondunn.com

/////

APPEARANCES OF COUNSEL(cont'd)

ALSO PRESENT:

Deborah Alvino, Videographer

Andrew Farthing, Director, Commercial

Litigation at Apple

Daniel Grbich, Concierge Technician

Patrick Holder, Ph.D., The Brattle Group

David J. Hutchings, The Brattle Group

Todd Kumler, Cornerstone Research

Solvejg A. Wewel, Analysis Group

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I N D E X

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DESCRIPTION

Exhibit 600	Expert Rebuttal Report of Michael I. Cragg, Ph.D.;	13
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Exhibit 601	Curriculum Vitae;	14
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Exhibit 602	Amicus Brief;	90
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Exhibit 603	Rebuttal Expert Report of Lorin Hitt, Ph.D., dated March 15, 2021.	180
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1 MICHAEL I. CRAGG, Ph.D.,  
2 having been first duly sworn, was examined and  
3 testified as follows:

4 MR. SWANSON: Thank you.

5 EXAMINATION

6 BY MR. SWANSON:

7 Q. Dr. Cragg -- let me make sure I'm  
8 pronouncing your name right. Is it Cragg?

9 A. Yes, it is.

10 Q. All right. Great.

11 I take it you've been deposed before?

12 A. I have.

13 Q. All right. And have you been deposed in  
14 the context of a video deposition before?

15 A. Yes.

16 Q. All right. So you're familiar with  
17 the -- the new procedures; is that correct?

18 A. I think so.

19 Q. Okay. Well, if you have any -- any  
20 questions or issues that pop up, let us know along  
21 the way and we'll try to deal with them.

22 A. Certainly.

23 Q. Thank you.

24 Is there any reason that we can't go  
25 forward with the deposition today; are you in good

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1 any conclusions from.

2 Q. Can you take a look at --

3 A. It's basically -- I mean, what I'm  
4 identifying is that the work he did was not useful.

5 Q. I understand that that's your opinion.

6 Let me ask you to turn to paragraph 37 on  
7 page 19. Let me know when you are there.

8 A. Yes.

9 Q. You say, at the end here, that short  
10 paragraph, that your "analysis examines consumers'  
11 playtime and expenditures when they acquire another  
12 device, properly controlling for other potentially  
13 confounding variables."

14 Do you see that?

15 A. Yes.

16 Q. Did you run any regression that you  
17 reported on consumers' expenditures?

18 A. I have not presented those, no.

19 Q. So you ran the regressions. You refer to  
20 them here, but you didn't produce them; is that  
21 correct?

22 A. I haven't produced them in this report.

23 MR. SWANSON: All right.

24 Peter, we request those regressions under  
25 the governing discovery stipulation in our

1 subpoena.

2 Can we take a -- like, a three-minute  
3 break, because I know time is about to run out --  
4 run out.

5 MR. BARBUR: Okay. That's fine.

6 MR. SWANSON: And we get -- can we get a  
7 time, see if -- how much --

8 THE VIDEOGRAPHER: We are going off the  
9 record at 5:36 p.m.

10 (Recess taken.)

11 THE VIDEOGRAPHER: We are going back on  
12 record at 5:38 p.m.

13 MR. SWANSON: All right. I have been  
14 informed that we've hit the seven-hour mark.

15 So over to you, Peter.

16 MR. BARBUR: Okay. I have no further  
17 questions.

18 And, Hector, do we also need to designate  
19 this "Confidential"?

20 MR. VALDES: Yes. That's been the  
21 practice.

22 So I think if you're going to do it as  
23 well, Daniel, we'll do it on behalf of Epic.

24 MR. SWANSON: Yeah.

25 MR. VALDES: "Highly Confidential."

1 I, Rebecca L. Romano, a Registered  
2 Professional Reporter, Certified Shorthand  
3 Reporter, Certified Court Reporter, do hereby  
4 certify:

5 That the foregoing proceedings were taken  
6 before me remotely at the time and place herein set  
7 forth; that any deponents in the foregoing  
8 proceedings, prior to testifying, were administered  
9 an oath; that a record of the proceedings was made  
10 by me using machine shorthand which was thereafter  
11 transcribed under my direction; that the foregoing  
12 transcript is true record of the testimony given.

13 Further, that if the foregoing pertains to the  
14 original transcript of a deposition in a Federal  
15 Case, before completion of the proceedings, review  
16 of the transcript [ ] was [X] was not requested.

17 I further certify I am neither financially  
18 interested in the action nor a relative or employee  
19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name.

22 Dated: March 30, 2021

23   
24

Rebecca L. Romano, RPR, CCR

25 CSR. No 12546